

Wyoming Department of Agriculture

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The Wyoming Department of Agriculture is dedicated to the promotion and enhancement of Wyoming's agriculture, natural resources and quality of life.



Dave Freudenthal, Governor
John Etchepare, Director

June 9, 2009

James A. Cagney, Field Manager
Bureau of Land Management
Lander Field Office
PO Box 589
Lander, WY 82520-0589

Dear Mr. Cagney:

Following are the Wyoming Department of Agriculture's (WDA) comments pertaining to the Bureau of Land Management (BLM) Lander Field Office proposed decisions to grazing permittees of the Green Mountain Common Allotment (GMCA) Environmental Analysis (EA).

Our comments are specific to our mission: dedication to the promotion and enhancement of Wyoming's agriculture, natural resources, and quality of life. As this proposed decision affects our agriculture industry, our natural resources, and the welfare of our citizens, it's important that we be kept informed of proposed actions and decisions and that we continue to be provided the opportunity to express pertinent issues and concerns.

The WDA supports the division of the GMCA into three allotments and the implementation of deferred grazing systems to each specific allotment. These management actions should improve the manageability of the allotments, the distribution of livestock throughout the allotments, and the overall health of the natural resources. In addition, developing cooperative monitoring plans will positively affect relationships between all parties involved and ensure that benefits of the proposed decision are adequately recorded.

It is imperative that Animal Unit Months (AUMs) remain at a sustainable level throughout the GMCA area. This sustainable level of AUMs does not only include providing for riparian health, upland vegetative health, and overall forage sustainability, but also includes providing for the sustainability of ranching operations. Livestock producers must maintain a level of AUMs that keeps their operations economically viable. Without these operations, it is likely that many private properties could be sold in smaller parcels, further fragmenting the landscape. This leads to a loss of open space, a loss of wildlife habitat, a loss of available livestock forage, and a loss of the scenic vistas that define Wyoming.

The WDA supports the approval of conservation non-use over the proposed suspension of AUMs. We encourage the Lander Field Office to use data obtained from recent monitoring efforts and sound science when next evaluating AUM numbers, grazing systems, and range improvements. This future decision should consider increasing AUMs to pre-suspension levels.

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Proper livestock grazing management and the completion of rangeland improvements should justify this increase.

BLM officials and grazing permittees should continue to work cooperatively. Flexibility to make the best site-specific, case-by-case decisions that are in the best interests of the affected resources and citizens should also be considered and addressed.

In conclusion, we appreciate the opportunities we have had to actively participate with BLM officials, permittees, and other interested publics in the development of alternatives and in commenting on proposed actions. We encourage continued attention to our concerns and we look forward to continuing cooperation on proposed actions and decisions.

Sincerely,



Jason Fearnheyhough
Director

JF/jc

CC: Governor's Planning Office
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